PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT

United States Mineral Products Company
d.b.a. Isolatek International
701 North Broadway
Huntington, Indiana 46750

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 069-5660-00021	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

TABLE OF CONTENTS

Testing Requirements [326 IAC 2-7-6(1)]
C.9 Performance Testing [326 IAC 3-6]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]
C.10 Compliance Schedule [326 IAC 2-7-6(3)]
C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
C.13 Monitoring Methods [326 IAC 3]
C.14 Pressure Gauge Specifications

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]
C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]
C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)] [326 IAC 2-6]
C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]
C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection
C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Two (2) cupolas and two (2) blowchambers (EU#1 - #4)

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]
D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]
D.1.4 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.1.5 Visible Emissions Notations
D.1.6 Parametric Monitoring
D.1.7 Baghouse and Screenhouse Inspections
D.1.8 Broken Bag or Failure Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.1.9 Record Keeping Requirements

D.2 FACILITY OPERATION CONDITIONS - All Other Significant Emission Units

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.2.1 Particulate Matter (PM) [326 IAC 6-3]
D.2.2 Prevention of Significant Deterioration [326 IAC 2-2]
D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary acoustic and thermal insulation manufacturing source.

Responsible Official:	Thomas Lund
Source Address:	701 North Broadway, Huntington, Indiana 46750
Mailing Address:	701 North Broadway, Huntington, Indiana 46750
SIC Code:	3296
County Location:	Huntington
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Two (2) short stack # 1 and # 2 cupolas, known as EU#1 and EU#2, installed before 1960, each equipped with a baghouse, known as CE#1 and CE#2, exhausted to Stack #1 and Stack #2, respectively, capacity: 7.2 tons of molten material per hour, each.

(b) Two (2) blowchambers, known as EU#3 and EU#4, installed before 1978, each equipped with a screenhouse, known as CE#3 and CE#4, (#1 and #2 screenhouse), capacity: 6.0 tons of fibers per hour, each.

(c) Three (3) hoppers, known as EU#14, EU#15 and EU#17 (hopper #1, #2 and #4), installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 5.0 tons of dry powdered binders per hour, each.

(d) Two (2) hoppers, known as EU#16 and EU#18 (hopper #3 and #5), installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 0.2 ton of dry powdered binders per hour, each.

(e) One (1) live bottom hopper, known as EU#19, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 8.0 tons of mineral wool per hour.

(f) One (1) granulator, known as EU#20, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 8.0 tons of mineral wool per hour.

(g) One (1) bagger, known as EU#21, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 12.0 tons of blended product per hour.

(h) Three (3) augers, known as EU#22, EU#23 and EU#24, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 12.0 tons of blended product per hour, each.

(i) One (1) portable hopper, known as EU#27 (portable hopper #3), installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 0.2 ton of dry powdered binders per hour.

(j) One (1) hammermill/cyclone, known as EU#28, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 2.0 tons of mineral wool per hour.

(k) Two (2) portable hoppers, known as EU#25 and EU#26, (portable hoppers #1 and #2, respectively), installed in 1980, exhausted inside the building, capacity: 0.75 tons of dry powdered binders per hour, each.

(l) Two (2) mineral wool balers, known as EU#5 and EU#6, installed before 1980, exhausted inside the building, capacity: 6.0 tons of baled mineral wool per hour, each.

(m) One (1) front end mineral wool bagger, known as EU#7, installed in 1987, equipped with a baghouse, known as CE#5, exhausted to Stack #5, capacity: 5.0 tons of bagged mineral wool per hour.

(n) One (1) mineral wool bin, known as EU#8, installed before 1980, equipped with a baghouse, known as CE#6, exhausted to Stack #6, capacity: 10.0 tons of mineral wool per hour.

(o) One (1) gypsum silo, known as EU#9, installed before 1980, equipped with a baghouse, known as CE#8, exhausted to Stack #8, capacity: 54.0 tons of gypsum per hour.

(p) One (1) chipped gypsum silo, known as EU#10, installed in 1991, equipped with a baghouse, known as CE#8, exhausted to Stack #8, capacity: 54.0 tons of gypsum per hour.

(q) One (1) cement silo, known as EU#11, installed in 1990, equipped with a baghouse, known as CE#7, exhausted to Stack #7, capacity: 54.0 tons of Portland cement per hour.

(r) One (1) batch blender, known as EU#12, installed in 1993, equipped with a baghouse, known as CE#6, exhausted to Stack #6, capacity: 5.0 tons of blended product per hour.

(s) One (1) debaler, known as EU#13, installed in 1980, exhausted inside the building, capacity: 5.0 tons of mineral wool per hour.

(t) One (1) raw material receiving yard, known as EU#29, installed prior to 1980, capacity: 216 tons of rock, slag and coke per hour.

(u) One (1) batching station, known as EU#30, installed prior to 1980, capacity: 14.4 tons of rock and coke per hour.

(v) One (1) ribbon blender, known as EU# 31, installed in 1988, equipped with a baghouse, known as CE#6, exhausted to Stack #6, capacity: 2.0 tons of dry powdered binders per year.

(w) One (1) dedust oil tank, known as EU#34, installed prior to 1980, exhausted to Stack # 17, capacity: 7,000 gallons.

(x) One (1) PEG400 VOC tank, known as EU#35, installed in 1990, capacity: 8,000 gallons.

(y) One (1) Dedust oil tank, known as EU#38, installed in 1997, exhausted to Stack #21, capacity: 8,000 gallons.

(z) One (1) perlite hopper, known as EU#39, installed in 1991, exhausted to Stack #22 indoors, capacity: 0.5 tons of perlite per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revok-

ing and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application forms, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408 (a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

(2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(i) A brief description of the change within the source;

(ii) The date on which the change will occur;

(iii) Any change in emissions; and

(iv) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable

fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.26 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 if such modifications occur during the term of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemption Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within

thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or per-

form the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response

steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements and Conditions must be clearly identified in such reports.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) Two (2) short stack # 1 and # 2 cupolas, known as EU#1 and EU#2, installed before 1960, each equipped with a baghouse, known as CE#1 and CE#2, exhausted to Stack #1 and Stack #2, respectively, capacity: 7.2 tons of molten material per hour, each.

(b) Two (2) blowchambers, known as EU#3 and EU#4, installed before 1978, each equipped with a screenhouse, known as CE#3 and CE#4, (#1 and #2 screenhouse), capacity: 6.0 tons of fibers per hour, each.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process operations), the allowable PM emission rate from:

(a) Each of the two (2) cupolas (EU#1 and EU#2) shall not exceed 15.4 pounds per hour each when operating at a process weight rate of 7.2 tons of molten mineral per hour.

(b) Each of the two (2) blowchambers (EU#3 and EU#4) shall not exceed 13.6 pounds per hour each when operating at a process weight rate of 6.0 tons of molten mineral per hour.

(c) The pounds per hour emission limitations were calculated with the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

(a) During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM testing of the exhaust stacks serving the two (2) cupolas (Stacks #1 and #2) utilizing Methods 5 or 17 (40 CFR 60, Appendix A) or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

(b) The Permittee is not required to test the two (2) blowchambers by this permit. However, IDEM may require compliance testing when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Particulate Matter (PM)

The baghouses (CE#1 and/or CE#2) and the screenhouses (CE#3 and/or CE#4) for PM control shall be in operation at all times when the cupolas (EU#1 and/or EU#2) and the blowchambers (EU#3 and/or EU#4) are in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Visible Emissions Notations

(a) Visible emission notations of the two (2) cupola (EU#1 and #2) and two blowchamber (EU#3 and #4) stack exhausts (Stack #1, #2, #3 and #4) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses (CE#1 and CE#2) and screenhouses (CE#3 and CE#4) used in conjunction with the two (2) cupolas and two (2) blowchambers, at least once daily when the insulation manufacturing processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouses CE#1 and CE#2 shall be maintained within the range of 3.0 and 12.0 inches of water and the pressure drop across screenhouses CE#3 and CE#4 shall be maintained within the range of 2.0 and 10.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.7 Baghouse and Screenhouse Inspections

(a) An inspection shall be performed each calendar quarter of all bags controlling the two (2) cupolas when venting to the atmosphere. All defective bags shall be replaced or the associated tubesheet opening capped as long as no more than ten percent (10%) of the number of total bags; thirty (30) bags for the cupola #1 baghouse; and sixty (60) bags for the cupola #2 baghouse, are capped.

(b) An inspection shall be performed each calendar quarter of all screens controlling the two (2) blowchambers when venting to the atmosphere. All defective screens shall be replaced.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed.

(a) The process associated with the affected compartments will be shut down or process charge suspended (process banked) immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, the process associated with the failed baghouse will be shut down or process charge suspended (process banked) immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the two (2) cupola and two (2) blowchamber stack exhausts once per shift.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure drop across the baghouse tube-sheet; and

(B) Cleaning cycle: frequency (baghouses that have cleaning cycles preset by the manufacturer, the Permittee can document the cycle once, versus re-documenting a preset every day) and differential pressure.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(c) Three (3) hoppers, known as EU#14, EU#15 and EU#17 (hopper #1, #2 and #4), installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 5.0 tons of dry powdered binders per hour, each.

(d) Two (2) hoppers, known as EU#16 and EU#18 (hopper #3 and #5), installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 0.2 ton of dry powdered binders per hour, each.

(e) One (1) live bottom hopper, known as EU#19, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 8.0 tons of mineral wool per hour.

(f) One (1) granulator, known as EU#20, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 8.0 tons of mineral wool per hour.

(g) One (1) bagger, known as EU#21, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 12.0 tons of blended product per hour.

(h) Three (3) augers, known as EU#22, EU#23 and EU#24, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 12.0 tons of blended product per hour, each.

(i) One (1) portable hopper, known as EU#27 (portable hopper #3), installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 0.2 ton of dry powdered binders per hour.

(j) One (1) hammermill/cyclone, known as EU#28, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 2.0 tons of mineral wool per hour.

(k) Two (2) portable hoppers, known as EU#25 and EU#26, (portable hoppers #1 and #2, respectively), installed in 1980, exhausted inside the building, capacity: 0.75 tons of dry powdered binders per hour, each.

(l) Two (2) mineral wool balers , known as EU#5 and EU#6, installed before 1980, exhausted inside the building, capacity: 6.0 tons of baled mineral wool per hour, each.

(m) One (1) front end mineral wool bagger, known as EU#7, installed in 1987, equipped with a baghouse, known as CE#5, exhausted to Stack #5, capacity: 5.0 tons of bagged mineral wool per hour.

(n) One (1) mineral wool bin, known as EU#8, installed before 1980, equipped with a baghouse, known as CE#6, exhausted to Stack #6, capacity: 10.0 tons of mineral wool per hour.

(o) One (1) gypsum silo, known as EU#9, installed before 1980, equipped with a baghouse, known as CE#8, exhausted to Stack #8, capacity: 54.0 tons of gypsum per hour.

(p) One (1) chipped gypsum silo, known as EU#10, installed in 1991, equipped with a baghouse, known as CE#8, exhausted to Stack #8, capacity: 54.0 tons of gypsum per hour.

(q) One (1) cement silo, known as EU#11, installed in 1990, equipped with a baghouse, known as CE#7, exhausted to Stack #7, capacity: 54.0 tons of Portland cement per hour.

(r) One (1) batch blender, known as EU#12, installed in 1993, equipped with a baghouse, known as CE#6, exhausted to Stack #6, capacity: 5.0 tons of blended product per hour.

(s) One (1) debaler, known as EU#13, installed in 1980, exhausted inside the building, capacity: 5.0 tons of mineral wool per hour.

(t) One (1) raw material receiving yard, known as EU#29, installed prior to 1980, capacity: 216 tons of rock, slag and coke per hour.

(u) One (1) batching station, known as EU#30, installed prior to 1980, capacity: 14.4 tons of rock and coke per hour.

(v) One (1) ribbon blender, known as EU# 31, installed in 1988, equipped with a baghouse, known as CE#6, exhausted to Stack #6, capacity: 2.0 tons of dry powdered binders per year.

(w) One (1) dedust oil tank, known as EU#34, installed prior to 1980, exhausted to Stack # 17, capacity: 7,000 gallons.

(x) One (1) PEG400 VOC tank, known as EU#35, installed in 1990, capacity: 8,000 gallons.

(y) One (1) Dedust oil tank, known as EU#38, installed in 1997, exhausted to Stack #21, capacity: 8,000 gallons.

(z) One (1) perlite hopper, known as EU#39, installed in 1991, exhausted to Stack #22 indoors, capacity: 0.5 tons of perlite per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the indicated facilities shall not exceed the PM emission limitations specified at the specified process weight rates listed in following table:

Emission Unit(s)	Process Weight Rate (tons per hour)	Allowable PM Emission Rate (pounds per hour)
EU#5 and EU#6	6.0, each	13.6, each
EU#7	5.0	12.1
EU#8	10.0	19.2
EU#9 and EU#10	54.0, each	45.3, each
EU#11	54.0	45.3
EU#12 and EU#13	5.0, each	12.1, each
EU#14 and EU#15	5.0, each	12.1, each
EU#16	0.2	1.40
EU#17	5.0	12.1
EU#18	0.2	1.40
EU#19 and EU#20	8.0, each	16.5, each
EU#21 - EU#24	12.0, each	21.7, each
EU#25 and EU#26	0.75, each	3.38, each
EU#27	0.2	1.40
EU#28	2.0	6.52
EU#31	2.0	6.52
EU#39	0.5	2.58

The pounds per hour limitations were calculated with the following equations:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

and

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.2.2 Prevention of Significant Deterioration [326 IAC 2-2]

Any change or modification for these emission units which may increase potential to emit to 25 tons per year for PM and 15 tons per year for PM_{10} shall require approval from IDEM, OAM prior to making the change.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for facilities, EU#7 - EU#12, EU#14, EU#15, EU#17, EU#19 - EU#24 and EU#27, and their control devices.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Particulate Matter (PM)

The baghouses (CE#5 - CE#9) for PM control shall be in operation at all times when their facilities are in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Visible Emissions Notations

(a) Visible emission notations of emission units EU#7 - EU#12, EU#14, EU#15, EU#17, EU#19, EU#24 and EU#27 stack exhausts (Stack #5, #6, #7, #8 and #9) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses (CE#5 - CE#9) used in conjunction with emission units EU# 7, 8, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, 22, 27 and 28 at least once daily when the insulation manufacturing processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouses CE#5 and CE#6 shall be maintained within the range of 2.0 and 7.0 inches of water, the pressure drop across baghouses CE#7 and CE#8 shall be maintained within the range of 1.0 and 6.0 inches of water, and the pressure drop

across baghouse CE#9 shall be maintained within the range of 0.5 and 2.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.2.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the insulation manufacturing operations when venting to the atmosphere. All defective bags shall be replaced or the associated tubesheet opening capped as long as no more than ten percent (10%) of the number of total bags are capped.

D.2.9 Broken or Failed Bag Detection

In the event that bag failure has been observed.

(a) The process associated with the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, the process associated with the failed baghouse will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

(a) To document compliance with Condition D.2.6, the Permittee shall maintain records of visible emission notations of the facilities stack exhausts once per shift.

(b) To document compliance with Condition D.2.7, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(b) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are re-directed.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: United States Mineral Products Company d.b.a. Isolatek International
Source Address: 701 North Broadway, Huntington, Indiana 46750
Mailing Address: 701 North Broadway, Huntington, Indiana 46750
Part 70 Permit No.: T 069-5660-00021

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: United States Mineral Products Company d.b.a. Isolatek International
Source Address: 701 North Broadway, Huntington, Indiana 46750
Mailing Address: 701 North Broadway, Huntington, Indiana 46750
Part 70 Permit No.: T 069-5660-00021

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT

Source Name: United States Mineral Products Company d.b.a. Isolatek International
Source Address: 701 North Broadway, Huntington, Indiana 46750
Mailing Address: 701 North Broadway, Huntington, Indiana 46750
Part 70 Permit No.: T 069-5660-00021

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of Each Deviation**

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name:	**United States Mineral Products Company, d.b.a. Isolatek International**
Source Location:	**701 North Broadway, Huntington, Indiana 46750**
County:	**Huntington**
Part 70 Operating Permit:	**OP T 069-5660-00021**
SIC Code:	**3296**
Permit Reviewer:	**Mark L. Kramer**

On May 18, 1999, the Office of Air Management (OAM) had a notice published in the Herald Press, Huntington, Indiana, stating that United States Mineral Products Company, d.b.a. Isolatek International, had applied for a Part 70 Operating Permit to operate an acoustic and thermal insulation manufacturing source with a cyclone and baghouses for particulate matter control. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On June 7 and July 8 and supplemented on August 5, 1999, Robert L. Henricks of GAI Consultants, Inc., submitted comments on behalf of United States Mineral Products Company, d.b.a. Isolatek International on their proposed Part 70 Operating Permit. The comments are as follows: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Comment 1:

The descriptive information contained in section A.1 through A.3 does not constitute enforceable conditions as stated in section A. This disclaimer should be added to the same information in sections D.1 and D.2.

The following statement should be added to D.1 and D.2 immediately after the header "Facility Description [326 IAC 2-7-5(15)]": The information describing the source contained in this condition is descriptive information and does not constitute enforceable conditions.

Response 1:

The following phrase has been added to the facility box in Sections D.1 and D.2 as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] **(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)**

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comments 2 - 8:

Each date included in sections A.2, D.1, and D.2 refers to the installation of the respective source equipment, as documented in the GSD-06 submitted October 29, 1998. To eliminate the misconception that each date documents when the respective control equipment was installed, this descriptive information could be put in parentheses and placed after the name or names of the emission unit(s) of each part of sections A.2, D.1, and D.2.

For example, A.2(a) should read: Two (2) short stack #1 and #2 cupolas (installed before 1960), known as ...

The two (2) blowchamber screenhouses, addressed initially in part A.2(b), do not vent through stacks. The reference to a stack/vent in the application refers only to a point of emission. As identified on the permit application plot plan, screenhouse CE#3 has dimensions of 30' x 22' x 14' (LxWxH). The exhaust vents directly to the atmosphere through the 9240 square feet of screen surface. The same is true with screenhouse CE#4, which has dimensions of 22' x 8' x 14' (LxWxH) and vents directly to the atmosphere through the 2464 square feet of screen surface.

This clarification would revise A.2(c) and D.1(b) to read as follows: ... ,(#1 and #2 screenhouse) exhausted to emission point #3 and #4, respectively, ...

This clarification would remove the requirement for emission testing of the blowchamber screenhouses contained in section D.1.4 by removing the following: “and the two (2) blowchambers (Stacks #3 and #4)” from this section.

Sections A.2(k) and D.2(k) refer to two (2) portable hoppers (EU#25 & EU#26), for which the TSD documents as having previously been permitted. The hourly process rate requires correction. The maximum process rate, which the permit should reflect, is 0.75 tons per hour. A spread sheet is enclosed documenting the potential emissions associated with operating at this rate. The potential emissions increase for this modification is 0.5 tons per year of PM.

It is requested that this correction be implemented through the yet-to-be issued Title V permit by revising sections A.2(k) and D.2(k) to read as follows: ..., capacity of 0.75 tons of dry powdered dry binders per hour, each.

Sections A.2(o) and D.2(o) refer to one (1) gypsum silo (EU#9), for which the TSD documents as not having previously been permitted. The hourly process rate requires correction. The historical maximum process rate, which the permit should reflect, is 54 tons per hour. A spread sheet is enclosed documenting the potential emissions associated with operating at this rate. The emission factor has been revised to be two (2) times the factor for a cement silo. There is no increase in potential emissions associated with this change.

It is requested that this correction be implemented through the yet-to-be issued Title V permit by revising sections A.2(o) and D.2(o) to read as follows: ..., capacity: 54 tons of gypsum per hour.

Sections A.2(p) and D.2(p) refer to one (1) chipped gypsum silo (EU#10), for which the TSD documents as not having previously been permitted. The hourly process rate requires correction. The historical maximum process rate, which the permit should reflect, is 54 tons per hour. A spread sheet is enclosed documenting the potential emissions associated with operating at this rate. The emission factor has been revised to be two (2) times the factor for a cement silo. There is no increase in potential emissions associated with this change.

It is requested that this correction be implemented through the yet-to-be issued Title V permit by revising sections A.2(p) and D.2(p) to read as follows: ..., capacity: 54 tons of gypsum per hour.

Sections A.2(q) and D.2(q) refer to one (1) cement silo (EU#11), for which the TSD documents as not having previously been permitted. The hourly process rate requires correction. The historical maximum process rate, which the permit should reflect, is 54 tons per hour. A spread sheet is enclosed documenting the potential emissions associated with operating at this rate. There is no increase in potential emissions associated with this change.

It is requested that this correction be implemented through the yet-to-be issued Title V permit by revising sections A.2(q) and D.2(q) to read as follows: ..., capacity: 54 tons of Portland cement per hour.

Sections A.2(t) and D.2(t) refer to one (1) raw material receiving yard (EU#29), for which the TSD documents as not having previously been permitted. The hourly process rate requires correction. The historical maximum process rate, which the permit should reflect, is 216 tons per hour. The emission factor has been revised to be ten (10) times the factor for a crushed stone unloading and loading operation. A spread sheet is enclosed documenting the potential emissions associated with operating at this rate.

It is requested that this correction be implemented through the yet-to-be issued Title V permit by revising sections A.2(t) and D.2(t) to read as follows: ..., capacity: 216 tons of rock, slag, and coke per hour.

Responses 2 - 8:

The emission unit description in Condition A.2 and Sections D.1 and D.2 have been revised as suggested as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Two (2) short stack # 1 and # 2 cupolas, known as EU#1 and EU#2, **installed before 1960,** each equipped with a baghouse, known as CE#1 and CE#2, ~~installed before 1960,~~ exhausted to Stack #1 and Stack #2, respectively, capacity: 7.2 tons of molten material per hour, each.

(b) Two (2) blowchambers, known as EU#3 and EU#4, **installed before 1978,** each equipped with a screenhouse, known as CE#3 and CE#4, (#1 and #2 screenhouse), ~~installed before 1978, exhausted to Stack #3 and Stack #4, respectively,~~ capacity: 6.0 tons of fibers per hour, each.

(c) Three (3) hoppers, known as EU#14, EU#15 and EU#17 (hopper #1, #2 and #4), **installed in 1980**, equipped with a baghouse, known as CE#9, ~~installed in 1980,~~ exhausted to Stack #9, capacity: 5.0 tons of dry powdered binders per hour, each.

(d) Two (2) hoppers, known as EU#16 and EU#18 (hopper #3 and #5), **installed in 1980,** equipped with a baghouse, known as CE#9, ~~installed in 1980,~~ exhausted to Stack #9, capacity: 0.2 ton of dry powdered binders per hour, each.

(e) One (1) live bottom hopper, known as EU#19, **installed in 1980,** equipped with a baghouse, known as CE#9, ~~installed in 1980,~~ exhausted to Stack #9, capacity: 8.0 tons of mineral wool per hour.

(f) One (1) granulator, known as EU#20, **installed in 1980,** equipped with a baghouse, known as CE#9, ~~installed in 1980,~~ exhausted to Stack #9, capacity: 8.0 tons of mineral wool per hour.

(g) One (1) bagger, known as EU#21, **installed in 1980,** equipped with a baghouse, known as CE#9, ~~installed in 1980,~~ exhausted to Stack #9, capacity: 12.0 tons of blended product per hour.

(h) Three (3) augers, known as EU#22, EU#23 and EU#24, **installed in 1980,** equipped with a baghouse, known as CE#9, ~~installed in 1980~~, exhausted to Stack #9, capacity: 12.0 tons of blended product per hour, each.

(i) One (1) portable hopper, known as EU#27 (portable hopper #3), **installed in 1980,** equipped with a baghouse, known as CE#9, ~~installed in 1980,~~ exhausted to Stack #9, capacity: 0.2 ton of dry powdered binders per hour.

(j) One (1) hammermill/cyclone, known as EU#28, **installed in 1980,** equipped with a baghouse, known as CE#9, ~~installed in 1980,~~ exhausted to Stack #9, capacity: 2.0 tons of mineral wool per hour.

(k) Two (2) portable hoppers, known as EU#25 and EU#26, (portable hoppers #1 and #2, respectively), installed in 1980, exhausted inside the building, capacity: ~~0.2~~ **0.75** tons of dry powdered binders per hour, each.

(l) Two (2) mineral wool balers , known as EU#5 and EU#6, installed before 1980, exhausted inside the building, capacity: 6.0 tons of baled mineral wool per hour, each.

(m) One (1) front end mineral wool bagger, known as EU#7, **installed in 1987,** equipped with a baghouse, known as CE#5, ~~installed in 1987~~, exhausted to Stack #5, capacity: 5.0 tons of bagged mineral wool per hour.

(n) One (1) mineral wool bin, known as EU#8, **installed before 1980,** equipped with a baghouse, known as CE#6, ~~installed before 1980,~~ exhausted to Stack #6, capacity: 10.0 tons of mineral wool per hour.

(o) One (1) gypsum silo, known as EU#9, **installed before 1980,** equipped with a baghouse, known as CE#8, ~~installed before 1980~~, exhausted to Stack #8, capacity: **54.0** ~~27.0~~ tons of gypsum per hour.

(p) One (1) chipped gypsum silo, known as EU#10, **installed in 1991,** equipped with a baghouse, known as CE#8, ~~installed in 1991,~~ exhausted to Stack #8, capacity: **54.0** ~~27.0~~ tons of gypsum per hour.

(q) One (1) cement silo, known as EU#11, **installed in 1990,** equipped with a baghouse, known as CE#7, ~~installed in1990,~~ exhausted to Stack #7, capacity: **54.0** ~~27.0~~ tons of

Portland cement per hour.

(r) One (1) batch blender, known as EU#12, **installed in 1993,** equipped with a baghouse, known as CE#6, ~~installed in 1993,~~ exhausted to Stack #6, capacity: 5.0 tons of blended product per hour.

(s) One (1) debaler, known as EU#13, installed in 1980, exhausted inside the building, capacity: 5.0 tons of mineral wool per hour.

(t) One (1) raw material receiving yard, known as EU#29, installed prior to 1980, capacity: 90.0 tons of rock, slag and coke per hour.

(u) One (1) batching station, known as EU#30, installed prior to 1980, capacity: 14.4 tons of rock and coke per hour.

(v) One (1) ribbon blender, known as EU# 31, **installed in 1988,** equipped with a baghouse, known as CE#6, ~~installed in 1988,~~ exhausted to Stack #6, capacity: 2.0 tons of dry powdered binders per year.

(w) One (1) dedust oil tank, known as EU#34, installed prior to 1980, exhausted to Stack # 17, capacity: 7,000 gallons.

(x) One (1) PEG400 VOC tank, known as EU#35, installed in 1990, capacity: 8,000 gallons.

(y) One (1) Dedust oil tank, known as EU#38, installed in 1997, exhausted to Stack #21, capacity: 8,000 gallons.

(z) One (1) perlite hopper, known as EU#39, installed in 1991, exhausted to Stack #22 indoors, capacity: 0.5 tons of perlite per hour.

and similarly in Section D.1 and D.2.

Since the blowchamber do not exhaust through stacks, Condition D.1.4 (now D.1.3) has been revised as follows:

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

(a) During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM testing of the exhaust stacks serving the two (2) cupolas (Stacks #1 and #2~~) and the two (2) blowchambers (Stacks #3 and #4)~~ utilizing Methods 5 or 17 (40 CFR 60, Appendix A) or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

(b) The Permittee is not required to test the two (2) blowchambers by this permit. However, IDEM may require compliance testing when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

As a result of the correction in the capacity of the portable hoppers, EU#25 and EU#26, a revised spreadsheet is attached. The total potential PM emissions increases from 0.175 to 0.657 tons per year or an increase of 0.482 tons per year.

As a result of the correction in capacity of EU#9 from 27 to 54 tons per hour with an emission factor that has always been 0.54 pounds per tons results in an increase of 63.9 tons per year uncontrolled and 0.639 tons per year after controls above that stated in the TSD.

For EU#10, the capacity correction from 27 to 54 tons per hour. The application stated that the PM/PM_{10} emission factor was 20 times the cement silo factor of 0.27 pounds per ton or 5.40 pounds per ton. Correcting the emission factor to double the cement silo factor of 0.27 pounds per ton equates to a doubling of the potential emissions before and after controls due to the corrected capacity. The increase in potential emissions is 63.9 tons per year uncontrolled and 0.639 tons per year with controls above that stated in the TSD.

For EU#11, the capacity correction from 27 to 54 tons per hour with the unchanged PM/PM_{10} emission factor of 0.27 pounds per ton, results in an emission increase of 31.9 tons per year uncontrolled and 0.320 tons per year after control above that stated in the TSD.

For EU#29, the emission factor in the application based on AP-42 Section 11.2.3 was 0.57 pounds per ton has been changed to ten (10) times AP-42 for loading and unloading crushed stone in Table 11.19.2-2. of 0.00244 pounds per tons for PM and 0.00116 pounds per ton for PM_{10}. These emission factors coupled with the correction in the capacity from 90 to 216 tons per hour changes the PM and PM_{10} from 224.7 tons per year to 2.31 tons per year for PM and 1.10 tons per year for PM_{10}. Based on the use of the loading and unloading emission factors, the change in potential emissions is 1.35 and 0.640 tons per year for PM and PM_{10}, respectively.

The following table summarizes the effects of the correction in capacity and corresponding changes in potential emissions before and after controls.

Emission Unit (EU #)	**Capacity Increase** (tons/hour)	**PTE PM Increase Before Controls** (tons/year)	**PTE PM Increase After Controls** (tons/year)	**PTE PM_{10} Increase Before Controls** (tons/year)	**PTE PM_{10} Increase After Controls** (tons/year)
25 & 26	27	0.482	0.482	0.482	0.482
9	27	63.9	0.639	63.9	0.639
10	27	63.9	0.639	63.9	0.639
11	27	31.9	0.320	31.9	0.320
29	126	1.35	1.35	0.640	0.640
Total Change		161.5	3.43	160.8	2.72

These increases in capacities for unpermitted emission units are in addition to those stated in the TSD for all unpermitted emission units. The following sections of the Technical Support Document have been updated to reflect the changes in source emissions due to changes in capacity and decrease in the magnitude of certain emission factors. See revised Appendix A, pages 1 - 8 of 8 for detailed emission calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	3,755
PM_{10}	3,754
SO_2	510
VOC	1,020
CO	15,768
NO_X	101

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPs	Potential Emissions (tons/year)
Carbonyl Sulfide	189
TOTAL	189

(a) The potential emissions (as defined in 326 IAC 1-2-55) of all criteria pollutants are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPS is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Limited Potential to Emit

The following table summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs
Two Cupolas EU#1 and #2 Two Blow Chambers EU#3 and #4	70.1	70.1	510	1,020	15,768	101	189
Insulation Processes EU#5 - #31, EU#34, EU#35, #38 and #39	34.5	33.3	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	5	5	1	5	2	3	2
Total Emissions	110	108	511	1,025	15,770	104	191

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is an existing major PSD source that has not been subject to review under PSD rules since EU#1 and EU#2 installed prior to 1960 and EU#3 and EU#4 installed prior to 1978 have potential emissions after controls that exceed 250 tons per year of SO_2, VOC and CO. Since this source is an existing major PSD source, the emissions from all future modifications will be subject to the PSD significant levels.

The emission units with known construction dates after 1980, installed in 1987 for EU#7, 1991 for EU#10, 1990 for EU#11, 1993 for EU#12, 1988 for EU#31, 1990 for EU#35, 1997 for EU#38 and 1991 for EU#39, in total, have controlled potential emissions of 10.7 (7.24 + 3.43) tons per year of PM and 9.96 (7.24 + 2.72) tons per year of PM_{10} and no emission of SO_2, NO_X and CO. Therefore the PSD significant levels of 25 tons per year for PM and 15 tons per year for PM_{10} were not exceeded even if all these modifications at the full capacities were considered as a single modification. All other emission units installed prior to 1980, with an unknown installation date, have been assumed to pre-date the applicability of this rule since permits were issued for this source in 1979 and 1985. Only EU#29 and EU#30 (fugitive emissions, not counted toward PSD definition) with unknown installation dates prior to 1980, exceed the PSD significant levels of 25 and 15 tons per year for PM and PM_{10}, respectively. Therefore no emission limits are necessary to avoid the applicability of 326 IAC 2-2.

In addition, Condition D.2.1 has been changed as follows:

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the indicated facilities shall not exceed the PM emission limitations specified at the specified process weight rates listed in following table:

Emission Unit(s)	Process Weight Rate (tons per hour)	Allowable PM Emission Rate (pounds per hour)
EU#5 and EU#6	6.0, each	13.6, each
EU#7	5.0	12.1
EU#8	10.0	19.2

Emission Unit(s)	Process Weight Rate (tons per hour)	Allowable PM Emission Rate (pounds per hour)
EU#9 and EU#10	**54.0** ~~27.0~~, each	**45.3** ~~37.3,~~ each
EU#11	**54.0** ~~27.0~~	**45.3** ~~37.3~~
EU#12 and EU#13	5.0, each	12.1, each
EU#14 and EU#15	5.0, each	12.1, each
EU#16	0.2	1.40
EU#17	5.0	12.1
EU#18	0.2	1.40
EU#19 and EU#20	8.0, each	16.5, each
EU#21 - EU#24	12.0, each	21.7, each
EU#25 and EU#26	~~0.2,~~ **0.75** each	**3.38** ~~1.40~~, each
EU#27	0.2	1.40
EU#28	2.0	6.52
EU#31	2.0	6.52
EU#39	0.5	2.58

The pounds per hour limitations were calculated with the following equation**s**:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

and

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Comment 9:

Section B.15 does not clarify that an exceedance of a surrogate or operating parameter is not a potential violation. As documented in the August 26, 1996 memo of Felicia R. George to Title V Sources, " The occurrence of a trigger does not, in and of itself, constitute a violation of the permit unless an underlying applicable standard condition is violated."

It is requested that the following be added at the end of B.15 to clarify this issue: *The exceedance of a surrogate or operating parameter does not, in and of itself, constitute a violation of the permit.*

Response 9:

The Office of Legal Counsel of IDEM has determined that the suggested wording cannot be incorporated as a clarification in the proposed Condition B.15, which stated:

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

because sometimes violations of surrogate parameters are permit violations, for example, when a New Source Performance Standard states that a given parameter can not be exceeded. Note that Condition B.16 (Deviations from Permit Requirements and Conditions) states that excursions from parametric monitoring are not a deviation from the permit, unless they are tied to an applicable rule or limit.

Comment 10:

Even though the applicant does not currently operate an incinerator, section C.4 should be modified to include a statement to the effect that referenced IAC rules are not federally enforceable.

Response 10:

IDEM initiated the following revision to Condition C.4 (Incineration) before the comment was submitted. Condition C.4 has been revised to state that 326 IAC 9-1-2 is not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. **The provisions of 326 IAC 9-1-2 are not federally enforceable.**

Comment 11:

The facility does not use coal. Therefore, the sulfur dioxide limitation of 326 IAC 7-1.1 contained in section D.1.1 does not apply to the facility. Please delete this section and section D.1.5 and the parts of section D.1.11 referring to SO_2 compliance and coal sampling.

Response 11:

326 IAC 7-1.1-2 refers to the limit for coal, but since coke is a residual of coal left after destructive distillation, the rule does not apply to coke. Therefore, Conditions D.1.1 and D.1.5 as well as the record keeping and reporting of Conditions D.1.11 and D.1.13 have been deleted as follows. There are no 326 IAC 7 rules applicable to coke combustion. The remaining Section D.1 conditions have been renumbered

~~D.1.1 Sulfur Dioxide (SO_2) Limitations [326 IAC 7-1.1]~~

~~Pursuant to 326 IAC 7-1.1, sulfur dioxide (SO_2) emissions from each of the two (2) cupolas shall be limited to six (6.0) pounds per million British thermal units heat input.~~

~~D.1.5 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6]~~

~~Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed six (6.0) pounds per million British thermal units. Compliance shall be determined utilizing one of the following options:~~

~~(a) Providing vendor analysis of coal delivered, if accompanied by a certification from the fuel supplier, as described under 40 CFR 60.48c(f)(3). The certification shall include:~~

~~(1) The name of the coal supplier; and~~

~~(2) The location of the coal when the sample was collected for analysis to determine the properties of the coal, specifically including whether the coal was sampled as delivered to the affected facility or whether the coal was collected from coal in storage at the mine, at a coal preparation plant, at a coal supplier's facility, or at another location. The certification shall include the name of the coal mine (and coal seam), coal storage facility, or coal preparation plant (where the sample was collected); and~~

~~(3) The results of the analysis of the coal from which the shipment came (or of the shipment itself) including the sulfur content, moisture content, ash content, and heat content; and~~

~~(4) The methods used to determine the properties of the coal; or~~

~~(b) Sampling and analyzing the coal by using one of the following procedures:~~

~~(1) Minimum Coal Sampling Requirements and Analysis Methods:~~

~~(A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;~~

~~(B) Coal shall be sampled at least one (1) time per day;~~

~~(C) Minimum sample size shall be five hundred (500) grams;~~

~~(D) Samples shall be composited and analyzed at the end of each calendar quarter;~~

~~(E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or~~

~~(2) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or~~

~~(c) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the cupolas, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]~~

~~A determination of noncompliance pursuant to any of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other method.~~

~~D.1.11 Record Keeping Requirements~~

~~(a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO_2 and PM emission limits established in D.1.1 and D.1.2.~~

~~(1) Calendar dates covered in the compliance determination period; and~~

~~(2) Actual coal usage since last compliance determination period; and~~

~~(3) Sulfur content, heat content, and ash content; and~~

~~(4) Sulfur dioxide emission rates; and~~

~~(5) Vendor analysis of coal and coal supplier certification, if the vendor analysis is used to determine compliance.~~

~~(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

~~D.1.13 Reporting Requirements~~

~~A summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, upon request.~~

Comment 12:

Parametric monitoring section D.1.8 requires pressure drop measurements across baghouses. The correct point of measurement is across the baghouse tube sheet for all baghouses. (Reference IDEM, OAM permit CP-129-7488-00035, for another source.) Also, the facility has reevaluated the proposed pressure drop limits and requests the revisions as described below.

Section D.1.8 should be revised to read as follows: The Permittee shall record the total static pressure drop across the baghouse tubesheets (CE#1 and CE#2) ... , the pressure drop across the baghouse tubesheets CE#1 and CE#2 shall be maintained within the range of 0.5 and 12 inches of water and the pressure drop across the screenhouses CE#3 and CE#4 shall be maintained within the range of 0.5 and 12 inches of water or a ...

Supplemental information was transmitted on August 5 in response to IDEM's request for verification of the large pressure drop ranges requested. This comment refers to the normal pressure drop ranges across either a baghouse tubesheet or a screenhouse as documented by the facility supervisory personnel, at least two of which are certified opacity readers in Indiana. These pressure drop ranges are indicative of normal operation of the respective source control equipment based on the observations and statements of these persons. These persons would provide a more accurate assessment of normal operation of the source pollutant control equipment at this facility than the vendor having provided any of the equipment currently in use since the two supervisory personnel are charged with the responsibility for correct operation and maintenance of the systems. Isolatek conducts all maintenance on the pollutant control systems under the direction of these two personnel.

Parametric monitoring section D.1.8 requires pressure drop measurements across baghouses. The correct point of measurement is across the baghouse tubesheet for all baghouses. (Reference IDEM, OAM permit CP-129-7488-00035.) Also, the facility has reevaluated the proposed pressure drop limits and requests the following revisions.

Section D.1.8 should be revised to read as follows: The Permittee shall record the total static pressure drop across the baghouse tubesheets (CE#1 and CE#2) ... , the pressure drop across the baghouse tubesheets CE#1 and CE#2 shall be maintained within the range of 3 and 12 inches of water and the pressure drop across the screenhouses CE#3 and CE#4 shall be maintained within the range of 2 and 10 inches of water or a ...

Parametric monitoring section D.2.7 requires pressure drop measurements across baghouses. The correct point of measurement is across the baghouse tubesheet for all baghouses. (Reference IDEM, OAM permit CP-129-7488-00035.) Also, the facility has reevaluated the proposed pressure drop limits and requests the revisions as described below.

Section D.2.7 should be revised to read as follows: The Permittee shall record the total static pressure drop across the baghouse tubesheets (CE#5 - CE#9) ... , the pressure drop across the baghouse tubesheets CE#5 - CE#6 shall be maintained within the range of 2 and 7 inches of water, across the baghouse tubesheets CE#7 - CE#8 shall be maintained within the range of 1 and 6 inches of water, and across the baghouse tubesheet CE#9 shall be maintained within the range of 0.5 and 2 inches of water, or a ...

Response 12:

Condition D.1.8 (now D.1.6) does not require any change to the normal pressure drop across baghouses CE#1 and CE#2 of 3.0 and 12.0 inches of water and of 2.0 and 10.0 inches of water for CE#3 and CE#4.

Condition D.2.7 has been revised as follows to incorporate the substantiation of the range of normal pressure drops for each baghouse. The magnitude of these ranges complies with IDEM policy guidance.

D.2.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses (CE#5 - CE#9) used in conjunction with emission units EU# 7, 8, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, 22, 27 and 28 at least once daily when the insulation manufacturing processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouses CE#5~~,~~ **and** CE#6, ~~CE#7 and CE#8~~ shall be maintained within the range of ~~3.0 and 8.0~~ **2.0 and 7.0** inches of water**, the pressure drop across baghouses CE#7 and CE#8, shall be maintained within the range of 1.0 and 6.0 inches of water** and the pressure drop across baghouse CE#9 shall be maintained within the range of 0.5 and **2**~~5~~.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

Comment 13:

Section D.1.9(a) seems to require internal collector inspections during operation. This is not possible due to the construction of the referenced baghouses. Also, mention is made of redirecting. The plant has no such practice for the subject exhausts and the applicant does not deem it appropriate for these two exhausts, which contain elevated concentrations of a regulated HAP. Also, a few tubesheet openings can be capped versus replacing bags as long as the practice is not extensive.

At times this practice is a quicker fix of a failed bag than the alternative and provides the same result.

Section D.1.9(a) should be revised to read as follows: An inspection shall be performed each calendar quarter of the baghouses controlling PM emissions of the two (2) cupolas. Defective bags shall be replaced or the associated tubesheet opening capped.

Response 13:

Condition D.1.9 (a) (now D.1.7(a)) has been revised to allow for capping of the tube sheets and to eliminate reference to what to do if redirecting the vents to exhaust to the atmosphere since they already exhaust to the atmosphere as per Compliance Branch, OAM, IDEM. No noticeable loss in overall PM emission control efficiency would be anticipated as long as not greater than ten percent (10%) of the bags in a fabric filter were capped. For the cupola #1 baghouse, ten percent (10%) of the number of total bags is thirty (30) bags; and for cupola #2 baghouse, ten percent (10%) of the number of total bags is sixty (60) bags. Therefore, the condition has been changed as follows:

D.1.9 Baghouse and Screenhouse Inspections

(a) An inspection shall be performed each calendar quarter of all bags controlling the two (2) cupolas when venting to the atmosphere. ~~A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.~~ All defective bags shall be replaced **or the associated tubesheet opening capped as long as no more than ten percent (10%) of the number of total bags; thirty (30) bags for the cupola #1 baghouse; and sixty (60) bags for the cupola #2 baghouse, are capped.**

Comment 14:

Section D.1.9(b) mentions redirecting. The plant has no such practice for the subject exhausts and the applicant does not deem it appropriate for these two exhausts, which contain significant moisture.

Section D.1.9(b) should be revised to read as follows: An inspection shall be performed each calendar quarter of all screens controlling PM emissions of the two (2) blowchambers. All defective screens shall be replaced.

Response 14:

Condition D.1.9(b) (now D.1.7(b)) has been revised to eliminate reference to what to do if redirecting the vents to exhaust to the atmosphere since they already exhaust to the atmosphere as follows:

D.1.9 Baghouse and Screenhouse Inspections

(b) An inspection shall be performed each calendar quarter of all screens controlling the two (2) blowchambers when venting to the atmosphere. ~~A screenhouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.~~ All defective screens shall be replaced.

Comment 15:

Section D.1.10 refers to shutting down sections of a baghouse, presumably as a result of detecting a bag failure during a baghouse inspection or visible emission evaluation. For the baghouses controlling PM emissions of the cupolas, this would result in more emissions than if the normal procedures for safe banking of the cupolas were followed. Also, processes EU#5, EU#6, and EU#8 downstream of the cupolas must be operated until the feed from the cupolas is suspended due to normal banking procedures. There is no safe operating mode to immediately stop the flow from either of the cupolas. In addition, maintenance of cupola baghouses can only be conducted safely during daylight hours.

Section D.1.10(a) should be revised as follows: The process associated with the affected compartments will be shut down or process charge suspended (process banked) immediately or as soon as is safe until the failed unit(s) have been repaired or replaced. Within eight (8) hours of ... Operations other than those described above in this section may continue ...

Section D.1.10(b) should be revised as follows: For single compartment baghouses, the process associated with the failed baghouse will be shut down or process charge suspended (process banked) immediately or as soon as is safe until the failed unit(s) have been repaired or replaced. Within eight (8) hours of ... Operations other than those described above in this section may continue.

Response 15:

The suggestion to incorporate the language is reasonable and therefore, Conditions D.1.10(a) and D.1.10(b) (now D.1.8(a) and D.1.8(b)) have been revised as follows. The suggested wording, “or as soon as is safe,” can not be incorporated due to the subjective nature of what determines “as is safe.”

D.1.10 Broken or Failed Bag Detection

In the event that bag failure has been observed.

(a) The **process associated with the** affected compartments will be shut down **or process charge suspended (process banked)** immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, **the process associated with the** failed ~~units and the associated process~~ **baghouse** will be shut down **or process charge suspended (process banked)** immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Comments 16 and 17:

Section D.1.12(b) [the first of two subsection b](1)(A) should be changed to correspond to section D.1.8: total static pressure drop across the baghouse tubesheet.

Section D.1.12(b) [the first of two subsection b](1)(B) should be changed to clarify that: "For those baghouses that have cleaning cycles preset by the manufacturer, the Permittee can document the cycle once, versus re-documenting a preset every day."

Responses 16 and 17:

The inclusion of more specific wording has been incorporated and approved by the Compliance Branch, OAM, IDEM in Condition D.1.12(b)(1)(A) (now D.1.9) and the redundancy of daily record keeping of the baghouse cleaning cycle when automatically performed has been eliminated, if appropriate, in Condition D.1.12(b)(1)(B) (now D.1.9) as follows: Note, that even though the cleaning cycle is preset. the source still needs to make sure that the baghouse is going through that cleaning cycle. The differential pressure is still being required and this should confirm that the unit is or is not going through this daily cleaning cycle.

D.1.12 Record Keeping Requirements

(b) To document compliance with Condition D.1.~~8~~ **6** the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure **drop across the baghouse tubesheet**; and

(B) Cleaning cycle: frequency **(baghouses that have cleaning cycles preset by the manufacturer, the Permittee can document the cycle once, versus re-documenting a preset every day)** and differential pressure.

Comment 18:

Section D.1.12(b) [the first of two subsection (b)(8) should be deleted to correspond to section D.1.9.

Response 18:

Since Condition D.1.9 (now D.1.7) concerning redirecting the exhausts was revised (See Response 13), Condition D.1.12 (now D.1.9) has been similarly revised as follows:

D.1.12 Record Keeping Requirements

(b) To document compliance with Condition D.1.6, the Permittee shall maintain the following:

~~(8) Documentation of the dates vents are redirected.~~

(~~b~~**c**) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7 ~~and the dates the vents are redirected~~.

Comment 19:

Section D.2.3 refers to a PMP for each facility. The lubrication schedule for bearings, for example, of the process units does not relate to potential or actual air emissions. There is no PM required

to be conducted for any of the process units that relates to potential or actual air emissions. PM for hoods and ductwork can affect potential or actual air emissions.

Revise section D.2.3 to read as follows: ... is required for the associated regulated pollutant hooding, ductwork, and control devices for facilities EU#7 ... and EU#27.

Response 19:

Condition D.2.3 requires a PMP for each facility listed as well as the associated hooding, ductwork and control devices. Since each of the specific emission units is not described in sufficient detail to determine all equipment that require a PMP, no change has been made to the wording. It is the responsibility of the Permittee to prepare the PMP for each facility as well as its control device(s).

Comment 20:

Parametric monitoring section D.2.7 requires pressure drop measurements across baghouses. The correct point of measurement is across the baghouse tube sheet for all baghouses. (Reference IDEM, OAM permit CP-129-7488-00035.) Also, the facility has reevaluated the proposed pressure drop limits and requests the revisions as described below.

Section D.2.7 should be revised to read as follows: The Permittee shall record the total static pressure drop across the baghouse tubesheets (CE#5 - CE#9) ... , the pressure drop across the baghouse tubesheets CE#5 - CE#9 shall be maintained within the range of 0.5 and 12 inches of water or a ...

Response 20:

See Response 12.

Comment 21:

Section D.2.8 should be revised as section D.1.9(a) to read as follows: Defective bags shall be replaced or the associated tubesheet opening capped.

Response 21:

Condition D.2.8 has been revised as follows to allow for capping of the tube sheets:

D.2.8 Baghouse Inspections

(a) An inspection shall be performed each calendar quarter of all bags controlling the insulation manufacturing operations when venting to the atmosphere. ~~A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.~~ All defective bags shall be replaced **or the associated tubesheet opening capped as long as no more than ten percent (10%) of the number of total bags are capped.**

Comment 22:

Section D.2.9 mandates immediate source shutdown. See comment 15 above.

Section D.2.9(a) should be revised as follows: The process associated with the affected compartments will be shut down immediately or as soon as is safe until the failed unit(s) have been repaired or replaced. Within eight (8) hours of ... Operations other than those described above in this section may continue ...

Section D.2.9(b) should be revised as follows: For single compartment baghouses, the process associated with the failed baghouse will be shut down immediately or as soon as is safe until the failed unit(s) have been repaired or replaced. Within eight (8) hours of ... Operations other than those described above in this section may continue ...

Response 22:

The suggestion to incorporate the language is reasonable and therefore, Conditions D.2.9(a) and D.2.9(b) have been revised as follows. The suggested wording, "or as soon as is safe," can not be incorporated due to the subjective nature of what determines "as is safe."

D.2.9 Broken or Failed Bag Detection

In the event that bag failure has been observed.

(a) The **process associated with the** affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, **the process associated with the** failed ~~units and the associated process~~ **baghouse** will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Comment 23:

The addressee of the permit should be changed as no Tom Curd works for the facility.

Response 23:

The responsible official cited in Condition A.1 is Thomas Lund and no change to the permit is necessary.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

1. Condition B.9 (Compliance with Permit Conditions) has been modified to show that conditions that are not federally enforceable may not constitute a violation of the Clean Air Act.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit**, except those specifically designated as not federally enforceable,** constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

2. Condition B.10 (Certification) has been revised since there are currently no certifications that would not be required to be certified by the Responsible Official.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]**[326 IAC 2-7-5(3)(C)]**

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, ~~and any other certification required under this permit,~~ shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

3. B.11(Annual Compliance Certification) delete (c)(5), OAM has decided that although we have the authority, it may be cumbersome for the source to list all insignificant activities in the annual compliance certification, so the requirement is being deleted from the permit. We have already received requests to take this out, and expect considerable more when sources do the first annual compliance certification.

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

~~(5) Any insignificant activity that has been added without a permit revision; and~~

~~(6)~~(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

3. Condition B.12 (Preventive Maintenance Plan) paragraphs (b) and (c) have been revised.

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that ~~lack of proper maintenance~~ **failure to implement the Preventive Maintenance Plan** does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. **IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.**

4. Condition B.14 (Permit Shield) paragraph (d) has been revised to clarify the intent of the condition.

B.14 Permit Shield [326 IAC 2-7-15]

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. **Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.**

5. Condition B.16 (Deviations from Permit Requirements and Conditions) paragraph (b)(3) has been revised to be consistent with Condition B.12.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless ~~lack of maintenance~~ **such failure** has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

6. Condition B.21 (Changes Under Section 502(b)(10) of the Clean Air Act) has been deleted and Condition B.20(b) (Operational Flexibility) has been revised as follows. Both conditions refer to the same rule and it makes more sense for them to be combined. Condition B.22 (re-numbered B.21)

(Operational Flexibility) the cite 326 IAC 2-1 has been replaced with 326 IAC 2-1.1 in Condition B.22(a)(2).

~~B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]~~

~~The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:~~

~~(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.~~

~~(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).~~

B.21 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC ~~2-1~~ **2-1.1** has been obtained;

~~(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:~~

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

(2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

~~(1)~~**(i)** A brief description of the change within the source;

~~(2)~~**(ii)** The date on which the change will occur;

~~(3)~~**(iii)** Any change in emissions; and

~~(4)~~**(iv)** Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

7. Condition B.23 (re-numbered Condition B.22) (Construction Permit Requirement), the referenced statute has been repealed therefore this condition has been revised as follows:

B.22 Construction Permit Requirement [326 IAC 2]

~~Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997,~~ **A** modification, construction, or reconstruction shall be approved ~~as~~ if required by and in accordance with **the applicable provisions of** 326 IAC 2.

8. Condition B.24 (re-numbered as Condition B.23) (Inspection and Entry) in order to clarify confidentiality Condition B.24 has been revised. OAM also determined that subpart (1) and (2) of paragraph (e) were unnecessary, therefore they have been deleted.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, **and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such,** the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

~~(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]~~

~~(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]~~

9. Condition B.26 (re-numbered as Condition B.25) (Annual Fee Payment) (b) has been revised.

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(b) ~~Failure~~ **Except as provided in 326 IAC 2-7-19(e), failure** to pay may result in administrative enforcement action or revocation of this permit.

10. Condition B.27 (re-numbered as Condition B.26) (Advanced Source Modification Approval) has been revised to clarify the intent.

B.26 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 ~~and~~ if such modifications occur ~~only~~ during the term of this permit.

11. Condition C.2 (Opacity) has been revised to cite the proper title for 326 IAC 5-1-3.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemption~~s~~ **Alternative Opacity Limitations**), opacity shall meet the following, unless otherwise stated in this permit:

12. Condition C.6 (Operation of Equipment) has been revised since there may be control devices that are not required to be used to assure compliance with emission limitations.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, ~~A~~**a**ll air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

13. Condition C.8 (Asbestos Abatement Projects) paragraph (e) has been revised to more accurately reflect the rule.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the **applicable** emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are ~~mandatory~~ **applicable** for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

14. Condition C.9 (Performance Testing) has been revised to specify the locations of applicable procedures and analysis methods for performance testing.

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing ~~methods~~ **any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures** approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the ~~Commissioner~~ **IDEM, OAM**, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

15. Condition C.11 (Compliance Monitoring) has been revised to clarify when compliance monitoring must begin.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. **All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.** The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment ~~no more than ninety (90) days after receipt of this permit~~. If due to circumstances beyond its control, ~~this schedule cannot be met~~ **that equipment cannot be installed and operated within ninety (90) days,** the Permittee may extend the compliance schedule **related to the equipment for** an additional ninety (90) days provided the Permittee notifies:

16. Condition C.13 (Monitoring Methods) has been revised to clarify that the monitoring and testing requirement are located in Section D of the permit.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing **required by Section D** ~~performed to meet the applicable requirements~~ of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

17. Condition C.21 (General Record Keeping Requirements) (c)(4) has been modified to match Condition B.12.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that ~~improper maintenance~~ **failure to implement the Preventive Maintenance Plan** did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required

by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

18. D.1.5 and D.2.6 as well as D.1.9(a) and D.2.10(a) have been revised to be consistent with the Criteria for Determining Compliance Monitoring guidance.

D.1.5 Visible Emissions Notations

(a) ~~Daily~~ ~~v~~**V**isible emission notations of the two (2) cupola (EU#1 and #2) and two blowchamber (EU#3 and #4) stack exhausts (Stack #1, #2, #3 and #4) shall be performed **once per shift** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

D.2.6 Visible Emissions Notations

(a) ~~Daily~~ ~~v~~**V**isible emission notations of emission units EU#7 - EU#12, EU#14, EU#15, EU#17, EU#19 - EU#24 and EU#27 stack exhausts (Stack #5, #6, #7, #8 and #9) shall be performed **once per shift** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.5, the Permittee shall maintain records of ~~daily~~ visible emission notations of the two (2) cupola and two (2) blowchamber stack exhausts **once per shift.**

D.2.10 Record Keeping Requirements

(a) To document compliance with Condition D.2.6, the Permittee shall maintain records of ~~daily~~ visible emission notations of the facilities stack exhausts **once per shift**.

Reporting Forms

19. Emergency/Deviation Occurrence Report the rule cite 326 IAC 2-7-5(3)(c) should have been a capital C, 326 IAC 2-7-5(3)(C).

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)~~(c)~~**(C)** C The Permittee must submit notice in writing within ten (**10**) calendar days

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name:	**United States Mineral Products Company, d.b.a. Isolatek International**
Source Location:	**701 North Broadway, Huntington, Indiana 46750**
County:	**Huntington**
SIC Code:	**3296**
Operation Permit No.:	**T 069-5660-00021**
Permit Reviewer:	**Mark L. Kramer**

The Office of Air Management (OAM) has reviewed a Part 70 permit application from relating to the operation of an acoustic and thermal insulation manufacturing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Two (2) short Stack # 1 and # 2 cupolas, known as EU#1 and EU#2, each rated at 27.0 million British thermal units per hour, each equipped with a baghouse, known as CE#1 and CE#2, installed before 1960, exhausted to Stack #1 and Stack #2, respectively, capacity: 7.2 tons of molten material per hour, each.

(b) Two (2) blowchambers, known as EU#3 and EU#4, each equipped with a screenhouse, known as CE#3 and CE#4, (#1 and #2 screenhouse), installed before 1978, exhausted to Stack #3 and Stack #4, respectively, capacity: 6.0 tons of fibers per hour, each.

(c) Three (3) hoppers, known as EU#14, EU#15 and EU#17 (hopper #1, #2 and #4), equipped with a baghouse, known as CE#9, installed in 1980, exhausted to Stack #9, capacity: 5.0 tons of dry powdered binders per hour, each.

(d) Two (2) hoppers, known as EU#16 and EU#18 (hopper #3 and #5), equipped with a baghouse, known as CE#9, installed in 1980, exhausted to Stack #9, capacity: 0.2 ton of dry powdered binders per hour, each.

(e) One (1) live bottom hopper, known as EU#19, equipped with a baghouse, known as CE#9, installed in 1980, exhausted to Stack #9, capacity: 8.0 tons of mineral wool per hour.

(f) One (1) granulator, known as EU#20, equipped with a baghouse, known as CE#9, installed in 1980, exhausted to Stack #9, capacity: 8.0 tons of mineral wool per hour.

(g) One (1) bagger, known as EU#21, equipped with a baghouse, known as CE#9, installed in 1980, exhausted to Stack #9, capacity: 12.0 tons of blended product per hour.

(h) Three (3) augers, known as EU#22, EU#23 and EU#24, equipped with a baghouse, known as CE#9, installed in 1980, exhausted to Stack #9, capacity: 12.0 tons of blended product per hour, each.

(i) One (1) portable hopper, known as EU#27 (portable hopper #3), equipped with a baghouse, known as CE#9, installed in 1980, exhausted to Stack #9, capacity: 0.2 ton of dry powdered binders per hour.

(j) One (1) hammermill/cyclone, known as EU#28, equipped with a baghouse, known as CE#9, installed in 1980, exhausted to Stack #9, capacity: 2.0 tons of mineral wool per hour.

(k) Two (2) portable hoppers, known as EU#25 and EU#26, (portable hoppers #1 and #2, respectively), installed in 1980, exhausted inside the building, capacity: 0.2 tons of dry powdered binders per hour, each.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

The source also consists of the following unpermitted facilities/units:

(l) Two (2) mineral wool balers, known as EU#5 and EU#6, installed before 1980, exhausted inside the building, capacity: 6.0 tons of baled mineral wool per hour, each.

(m) One (1) front end mineral wool bagger, known as EU#7, equipped with a baghouse, known as CE#5, installed in 1987, exhausted to Stack #5, capacity: 5.0 tons of bagged mineral wool per hour.

(n) One (1) mineral wool bin, known as EU#8, equipped with a baghouse, known as CE#6, installed before 1980, exhausted to Stack #6, capacity: 10.0 tons of mineral wool per hour.

(o) One (1) gypsum silo, known as EU#9, equipped with a baghouse, known as CE#8, installed before 1980, exhausted to Stack #8, capacity: 27.0 tons of gypsum per hour.

(p) One (1) chipped gypsum silo, known as EU#10, equipped with a baghouse, known as CE#8, installed in 1991, exhausted to Stack #8, capacity: 27.0 tons of gypsum per hour.

(q) One (1) cement silo, known as EU#11, equipped with a baghouse, known as CE#7, installed in1990, exhausted to Stack #7, capacity: 27.0 tons of Portland cement per hour.

(r) One (1) batch blender, known as EU#12, equipped with a baghouse, known as CE#6, installed in 1993, exhausted to Stack #6, capacity: 5.0 tons of blended product per hour.

(s) One (1) debaler, known as EU#13, installed in 1980, exhausted inside the building, capacity: 5.0 tons of mineral wool per hour.

(t) One (1) raw material receiving yard, known as EU#29, installed prior to 1980, capacity: 90.0 tons of rock, slag and coke per hour.

(u) One (1) batching station, known as EU#30, installed prior to 1980, capacity: 14.4 tons of rock and coke per hour.

(v) One (1) ribbon blender, known as EU# 31, equipped with a baghouse, known as CE#6, installed in 1988, exhausted to Stack #6, capacity: 2.0 tons of dry powdered binders per year.

(w) One (1) dedust oil tank, known as EU#34, installed prior to 1980, exhausted to Stack # 17, capacity: 7,000 gallons.

(x) One (1) PEG400 VOC tank, known as EU#35, installed in 1990, capacity: 8,000 gallons.

(y) One (1) dedust oil tank, known as EU#38, installed in 1997, exhausted to Stack #21, capacity: 8,000 gallons.

(z) One (1) perlite hopper, known as EU#39, installed in 1991, exhausted to Stack #22 indoors, capacity: 0.5 tons of perlite per hour.

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(c) The following VOC and HAP storage containers: storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(d) Noncontact cooling tower systems with the following: Forced and induced draft cooling tower system not regulated under a NESHAP.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Heat exchanger cleaning and repair.

(g) Process vessel degassing and cleaning to prepare for internal repairs.

(h) A laboratory as defined in 326 IAC 2-7-1(21)(D).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following: list permits, registrations, modifications, exemptions, etc.

(a) 35-09-83-0109 issued to Guardian Industries, Insulation Division, issued on October 11, 1979.

(b) 35-09-83-0110 issued to Guardian Industries, Insulation Division, issued on October 11, 1979.

(c) 35-09-83-0111 issued to Guardian Industries, Insulation Division, issued on October 11, 1979.

(d) 35-09-87-0133 issued to United States Mineral Products Company, issued on February 13, 1985.

(e) 35-09-87-0134 issued to United States Mineral Products Company, issued on February 13, 1985.

(f) 35-09-87-0135 issued to United States Mineral Products Company, issued on February 13, 1985.

(g) Registration Letter issued to United States Mineral Company, issued on October 20, 1989.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(a) 35-09-83-0109 issued to Guardian Industries, Insulation Division, issued on October 11, 1979, and

(b) 35-09-83-0110 issued to Guardian Industries, Insulation Division, issued on October 11, 1979.

Conditions (6) in both permits: That sulfur dioxide emissions shall be limited to 0.44 pounds per million British thermal units, 44 pounds per hour and 140 tons per year for cupolas #1 and #2 and blowchambers #1 and #2.

Reason not incorporated: These two (2) permits were superceded by 35-09-87-0133 and 0134 issued on February 13, 1985, which did not included these sulfur dioxide emission limitations for the identical facilities but this proposed permit incorporates the 326 IAC 7-1 SO_2 limit of 6.0 pounds per million British thermal units.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on April 2, 1996. Additional information was received on December 21, 1998 and March 19, 1999.

A notice of completeness letter was mailed to the source on February 10, 1997.

Emission Calculations

See pages 1 - 8 of 8 of Appendix A of this document for detailed emissions calculations. Note that the calculations based on the emission factors have been used for the potentials emissions before and after controls. The emissions before and after controls based on grain loading have been provided for informational purposes only.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	**Potential Emissions** (tons/year)
PM	4,392
PM_{10}	4,392
SO_2	510
VOC	1,020
CO	15,768
NO_x	101

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPS	Potential Emissions (tons/year)
Carbonyl Sulfide	189
TOTAL	189

(a) The potential emissions (as defined in 326 IAC 1-2-55) of all criteria pollutants are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPS is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1995 emission data provided in the application.

Pollutant	Actual Emissions (tons/year)
PM	72.6
PM_{10}	72.6
SO_2	336
VOC	52.0
CO	10,406
NO_x	68.6
Cabonyl sulfide	71.4

Limited Potential to Emit

The following table summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs
Two Cupolas EU#1 and #2 Two Blow Chambers EU#3 and #4	70.1	70.1	510	1,020	5,768	101	189
Insulation Processes EU#5 - #31, EU#34, EU#35, #38 and #39	261	261	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	5	5	1	5	2	3	2
Total Emissions	336	336	511	1,025	5,770	104	191

County Attainment Status

The source is located in Huntington County.

Pollutant	Status
PM_{10}	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Huntington County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) This mineral wool manufacturing source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.680, Subpart PPP), since this source does not meet the definition of a wool fiberglass insulation manufacturing line. Specifically, this source does not produce insulation material composed of glass fibers made from glass produced or melted at the source.

(b) Since all of the storage vessels at this source, built after May 18, 1978 have capacities less than 40 cubic meters, the storage vessels are not subject to 40 CFR 60.110a, Subpart Ka and 40 CFR 60.110b, Subpart Kb.

(c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) 40 CFR Part 63 applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is an existing major PSD source that has not been subject to review under PSD rules since EU#1 and EU#2 installed prior to 1960 and EU#3 and EU#4 installed prior to 1978 have potential emissions after controls that exceed 250 tons per year of SO_2, VOC and CO. Since this source is an existing major PSD source, the emissions from all future modifications will be subject to the PSD significant levels.

The emission units with known construction dates after 1980, installed in 1987 for EU#7, 1991 for EU#10, 1990 for EU#11, 1993 for EU#12, 1988 for EU#31, 1990 for EU#35, 1997 for EU#38 and 1991 for EU#39, in total, have controlled potential emissions of 7.24 tons per year of PM and PM_{10} and no emission of SO_2, NO_X and CO. Therefore the PSD significant levels of 25 tons per year for PM and 15 tons per year for PM_{10} were not exceeded even if all these modifications were considered as a single modification. All other emission units installed prior to 1980, with an unknown installation date, have been assumed to pre-date the applicability of this rule since permits were issued for this source in 1979 and 1985. Only EU#29 and EU#30 (fugitive emissions, not counted toward PSD definition) with unknown installation dates prior to 1980, exceed the PSD significant levels of 25 and 15 tons per year for PM and PM_{10}, respectively. Therefore no emission limits are necessary to avoid the applicability of 326 IAC 2-2.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM, VOC, NO_X, SO_2 and CO. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity)

This source is subject to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-7-5(13) (Preventive Maintenance Plan)

(a) A Preventive Maintenance Plan is required for emissions units EU#1-EU#4, EU#7, EU#8, EU#9, EU#10, EU#11, EU#12, EU#14, EU#15, EU#17, EU#19, EU#20, EU#21, EU#22, EU#23, EU#24 and EU#27 because:

(1) They have control devices, and

(2) The allowable PM, SO_2 or VOC emissions exceed 10 pounds per hour.

(b) A Preventive Maintenance Plan is not required for emissions units EU#16, EU#18, EU#28 and EU#31 even though they have control devices because:

(1) The allowable PM, SO_2 or VOC emissions do not exceed 10 pounds per hour, and

(2) There is no NSPS or NESHAP that applies.

(c) A Preventive Maintenance Plan is not required for emissions units EU#29 and EU#30 because:

The emission unit does not have controls and the emissions are fugitive.

(d) A Preventive Maintenance Plan is not required for emissions units EU#5 EU#6, EU#13 EU#25, EU#26, EU#34, EU#35, EU#38 and EU#39 because:

The emission units do not have controls and actual emissions do not exceed 25 tons per year.

326 IAC 2-7-6(1),(6) (Testing Requirements)

The Permittee is required to test the two (2) cupolas and two (2) blowchambers for PM emission rates. However, IDEM may require compliance testing at any specific time when necessary to determine if these facilities or the other emission units are in compliance.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the emission units listed below shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The control equipment shall be in operation at all times each facility is in operation, in order to comply with this limit, unless other noted as follows:

Operation	Process Weight Rate (tons per hour)	Allowable PM Emission Rate (pounds per hour)	Potential PM Emission Rate After Controls (pounds per hour)
EU#1 and EU#2	7.2, each	15.4, each	0.800, each
EU#3 and EU#4	6.0, each	13.6, each	7.20, each
EU#5 and EU#6	6.0, each	13.6, each	0.600, each
EU#7	5.0	12.1	0.050
EU#8	10.0	19.2	0.010
EU#9 and EU#10	27.0, each	37.3, each	1.46, each
EU#11	27.0	37.3	0.073
EU#12 and EU#13	5.0, each	12.1, each	0.050, each
EU#14 and EU#15	5.0, each	12.1, each	0.285, each
EU#16	0.2	1.40	0.011
EU#17	5.0	12.1	0.285
EU#18	0.2	1.40	0.011
EU#19 and EU#20	8.0, each	16.5, each	0.456, each
EU#21 - EU#24	12.0, each	21.7, each	0.684, each
EU#25 and EU#26	0.2, each	1.40, each	0.020, each
EU#27	0.2	1.40	0.011
EU#28	2.0	6.52	0.110
EU#29 & EU#30	Fugitive		
EU#31	2.0	6.52	0.020
EU#39	0.5	2.58	negligible

326 IAC 7-1 1-2 (Sulfur dioxide emission limitations)

Each of the two (2) blowchambers (EU#3 and EU#4) are not subject to the requirements of this rule since the potential sulfur dioxide emissions of 0.63 pounds per hour and 2.74 tons per year are less than ten (10) pounds per hour and twenty-five (25) tons per year.

However, sulfur dioxide (SO_2) emissions from each of the two (2) cupolas (EU#1 and EU#2) rated at 27.0 million British thermal units per hour shall be limited to 6.0 pounds per million British thermal units heat input for coal (coke).

The following calculation shows that each of the two (2) cupolas are in compliance with the 6.0 pounds of SO_2 per million British thermal units heat input limit stated in the above condition:

Sulfur dioxide emissions from page 2 of 8 are 57.6 pounds per hour for each of the two (2) cupolas. Therefore 57.6 pounds of SO_2 per hour divided by 27.0 million British thermal units per hour equals 2.13 lbs of SO_2 per million British thermal units. Therefore both cupolas comply with this rule.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

The two (2) cupolas with a capacity of 7.2 tons of metal per hour, each are exempt from this rule since they were both constructed and began operations prior to 1960 which is prior to the March 21, 1972 applicability date.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The emission units equipped with either a baghouse or screenhouse have applicable compliance monitoring conditions as specified below:

(1) Daily visible emissions notations of the baghouse/screenhouse stack exhausts, known as Stacks 1, 2, 3, 4, 5, 6, 7, 8 and 9 shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(2) The Permittee shall record the total static pressure drop across each baghouse and screenhouse controlling the acoustic and thermal insulation operations, at least once daily when the source is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the

baghouse/screenhouse shall be maintained within the range specified below or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

Type of Control Device	Identification	Normal Range of Pressure Drop (inches of water)
Baghouse	CE#1	3 - 12
Baghouse	CE#2	3 - 12
Screenhouse	CE#3	2 - 10
Screenhouse	CE#4	2 - 10
Baghouse	CE#5	3 - 8
Baghouse	CE#6	3 - 8
Baghouse	CE#7	3 -8
Baghouse	CE#8	3 - 8
Baghouse	CE#9	0.5 - 5

These monitoring conditions are necessary because the baghouses/screenhouses for the insulation processes must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

(b) The two (2) cupolas have additional applicable compliance monitoring conditions as specified below:

The Permittee shall demonstrate that the sulfur dioxide emissions do not exceed six (6.0) pounds per million British thermal units. Compliance shall be determined utilizing one of the following options:

(1) Providing vendor analysis of coal delivered, if accompanied by a certification from the fuel supplier, as described under 40 CFR 60.48c(f)(3).

(2) Sampling and analyzing the coal.

(3) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the cupola, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See attached calculations for detailed air toxic calculations on page 2 of 8.

Conclusion

The operation of this acoustic and thermal insulation manufacturing source shall be subject to the conditions of the attached proposed Part 70 Permit No. T 069-5660-00021.

Appendix A: Emission Calculations
Baghouse Operations

Company Name: United States Mineral Products Company d.b.a. Isolatek International
Address City IN Zip: 701 North Broadway, Huntington, Indiana 46750
Part 70: T 069-5660
Plt ID: 069-00021
Reviewer: Mark L. Kramer
Date: April 2, 1996

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lbs/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lbs/hr)	Emission Rate after Controls (tons/yr)
CE#1/EU#1	99.0%	0.003	18000.0	46.3	202.73	0.463	2.03
CE#2/EU#2	99.0%	0.002	29000.0	49.7	217.75	0.497	2.18
CE#3/EU#3	90.0%	0.020	28000.0	48.0	210.24	4.800	21.02
CE#4/EU#4	90.0%	0.020	28000.0	48.0	210.24	4.800	21.02
CE#5/EU#7	99.0%	0.040	5000.0	171.4	750.86	1.714	7.51
CE#6/EU#8, 12 & 31	99.0%	0.010	7500.0	64.3	281.57	0.643	2.82
CE#8/EU#9 & EU#10	99.0%	0.030	300.0	7.7	33.79	0.077	0.338
CE#7/EU#11	99.0%	1.000	300.0	257.1	1126.29	2.571	11.263
CE#9/EU#14-24, 27 &28	99.0%	0.010	7500.0	64.3	281.57	0.643	2.82
				Totals	3315.03		70.99

Methodology
Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Allowable Rate of Emissions

Unit ID	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)	Allowable Emissions (tons/yr)	Emission Rate after Controls (tons/yr)
CE#1/EU#1	7.20	15.39	67.4	2.03
CE#2/EU#2	7.20	15.39	67.4	2.18
CE#3/EU#3	6.00	13.62	59.7	21.02
CE#4/EU#4	6.00	13.62	59.7	21.02
CE#5/EU#7	5.00	12.05	52.8	7.51
CE#6/EU#12	5.00	12.05	52.8	
CE#6/ EU#31	2.00	6.52	28.6	
CE#6/ EU#8	10.00	19.18	84.0	
CE#6/EU#8, 12 & EU#31	17.00	27.36	119.9	0.338
CE#8/EU#9	27.00	37.31	163.4	
CE#8/EU#10	27.00	37.31	163.4	
CE#8/EU#9 & EU#10	54.00	45.30	198.4	0.338
CE#7/EU#11	27.00	37.31	163.4	11.26
CE#9/EU#14-15,17 EACH	5.00	12.05	52.8	
CE#9/EU#16,18,27 EACH	0.20	1.39	6.11	
CE#9/EU 19, 20 EACH	8.00	16.51	72.3	
CE#9/EU#21-24 EACH	12.00	21.67	94.9	
CE#9/EU#28	2.00	6.52	28.6	
CE#9/EU#14-24, 27 &28	81.60	49.26	215.8	70.99

Methodology
For Process Weight Rates
less than or equal to 30 tons per hour

Allowable Emissions = 4.10(Process Weight Rate)^0.67

For Process Weight Rates
more than or equal to 30 tons per hour

Allowable Emissions = 55(Process Weight Rate)^0.11 - 40

Emission Unit	**EU#1 Cupola #1**								
Pollutant	Maximum Rate (tons/hr)	Emission Factor (lbs/tons)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Allowable Emission Rate (lbs/hr)	
PM	5.0	16.0	80.0	350.4	99.0%	0.800	3.50	15.4	AP-42 Table 11.18-2
PM-10	5.0	16.0	80.0	350.4	99.0%	0.800	3.50		AP-42 Table 11.18-2
SO2	7.2	8.0	57.60	252.29	0.0%	57.600	252.29		AP-42 Table 11.18-4
NOx	7.2	1.6	11.52	50.46	0.0%	11.520	50.46		AP-42 Table 11.18-6
VOC	7.2	0.0	0.00	0.00	0.0%	0.000	0.00		
CO	7.2	250.0	1800.00	7884.00	0.0%	1800.000	7884.00		AP-42 Table 11.18-4
CS	7.2	3.0	21.60	94.61	0.0%	21.600	94.608		AP-42 Table 11.18-6

Emission Unit	**EU#2 Cupola #2**								
Pollutant	Maximum Rate (tons/hr)	Emission Factor (lbs/tons)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Allowable Emission Rate (lbs/hr)	
PM	5.0	16.0	80.0	350.4	99.0%	0.800	3.50	15.4	AP-42 Table 11.18-2
PM-10	5.0	16.0	80.0	350.4	99.0%	0.800	3.50		AP-42 Table 11.18-2
SO2	7.2	8.0	57.60	252.29	0.0%	57.600	252.29		AP-42 Table 11.18-4
NOx	7.2	1.6	11.52	50.46	0.0%	11.520	50.46		AP-42 Table 11.18-6
VOC	7.2	0.0	0.00	0.00	0.0%	0.000	0.00		
CO	7.2	250.0	1800.00	7884.00	0.0%	1800.000	7884.00		AP-42 Table 11.18-4
CS	7.2	3.0	21.60	94.61	0.0%	21.600	94.608		AP-42 Table 11.18-6

Emission Unit	**EU#3 Blowchamber #1**								
Pollutant	Maximum Rate (tons/hr)	Emission Factor (lbs/tons)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Allowable Emission Rate (lbs/hr)	
PM	6.0	12.00	72.0	315.4	90.0%	7.20	31.5	13.6	AP-42 Table 11.18-2
PM-10	6.0	12.00	72.0	315.4	90.0%	7.20	31.5		AP-42 Table 11.18-2
SO2	7.2	0.087	0.63	2.74	0.0%	0.626	2.74		AP-42 Table 11.18-4
NOx	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		AP-42 Table 11.18-6
VOC	6.0	19.40	116.40	509.83	0.0%	116.400	509.83		
CO	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		AP-42 Table 11.18-4

Emission Unit **EU#4 Blowchamber #2**

Pollutant	Maximum Rate (tons/hr)	Emission Factor (lbs/tons)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Allowable Emission Rate (lbs/hr)	
PM	6.0	12.00	72.0	315.4	90.0%	7.20	31.5	13.6	AP-42 Table 11.18-2
PM-10	6.0	12.00	72.0	315.4	90.0%	7.20	31.5		AP-42 Table 11.18-2
SO2	7.2	0.087	0.63	2.74	0.0%	0.626	2.74		AP-42 Table 11.18-4
NOx	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		AP-42 Table 11.18-6
VOC	6.0	19.40	116.40	509.83	0.0%	116.400	509.83		
CO	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		AP-42 Table 11.18-4

Emission Unit **EU#5 Wool Baler**

Pollutant	Maximum Rate (tons/hr)	Emission Factor (lbs/tons)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Allowable Emission Rate (lbs/hr)	
PM	6.0	0.10	0.6	2.6	0.0%	0.600	2.63	13.6	Engineering Judgment
PM-10	6.0	0.10	0.6	2.6	0.0%	0.600	2.63		
SO2	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
NOx	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
VOC	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
CO	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		

Emission Unit **EU#6 Wool Baler**

Pollutant	Maximum Rate (tons/hr)	Emission Factor (lbs/tons)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Allowable Emission Rate (lbs/hr)	
PM	6.0	0.10	0.6	2.6	0.0%	0.600	2.63	13.6	Engineering Judgment
PM-10	6.0	0.10	0.6	2.6	0.0%	0.600	2.63		
SO2	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
NOx	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
VOC	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
CO	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		

Emission Unit	**EU#7 Bagger**								
Pollutant	Maximum Rate (tons/hr)	Emission Factor (lbs/tons)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Allowable Emission Rate (lbs/hr)	
PM	5.0	1.00	5.0	21.9	99.0%	0.050	0.219	12.1	Measurement at CE#5
PM-10	5.0	1.00	5.0	21.9	99.0%	0.050	0.219		
SO2	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
NOx	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
VOC	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
CO	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		

Emission Unit	**EU#8 Wool Bin**								
Pollutant	Maximum Rate (tons/hr)	Emission Factor (lbs/tons)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Allowable Emission Rate (lbs/hr)	
PM	10.0	0.10	1.0	4.4	99.0%	0.0100	0.0438	19.2	Engineering judgment
PM-10	10.0	0.10	1.0	4.4	99.0%	0.0100	0.0438		
SO2	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
NOx	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
VOC	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
CO	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		

Emission Unit	**EU#9 Gypsum Silo**								
Pollutant	Maximum Rate (tons/hr)	Emission Factor (lbs/tons)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Allowable Emission Rate (lbs/hr)	
PM	27.0	0.54	14.6	63.9	99.0%	0.146	0.6	37.3	AP-42 8.10-1 x 20
PM-10	27.0	0.54	14.6	63.9	99.0%	0.146	0.6		
SO2	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
NOx	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
VOC	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
CO	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		

Emission Unit **EU#10 Chip Gypsum Silo**

Pollutant	Maximum Rate (tons/hr)	Emission Factor (lbs/tons)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Allowable Emission Rate (lbs/hr)	
PM	27.0	5.40	145.8	638.6	99.0%	1.46	6.4	37.3	AP-42 T^able 11.12-2
PM-10	27.0	5.40	145.8	638.6	99.0%	1.46	6.4		and scaled 20x
SO2	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
NOx	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
VOC	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
CO	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		

Emission Unit **EU#11 Cement Silo**

Pollutant	Maximum Rate (tons/hr)	Emission Factor (lbs/tons)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Allowable Emission Rate (lbs/hr)	
PM	27.0	0.27	7.3	31.9	99.0%	0.073	0.3	37.3	AP-42 Table 11.12-2
PM-10	27.0	0.27	7.3	31.9	99.0%	0.073	0.3		
SO2	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
NOx	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
VOC	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
CO	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		

Emission Unit **EU#12 Batch Blender**

Pollutant	Maximum Rate (tons/hr)	Emission Factor (lbs/tons)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Allowable Emission Rate (lbs/hr)	
PM	5.0	1.00	5.0	21.9	99.0%	0.050	0.219	12.1	Measured at CE#6
PM-10	5.0	1.00	5.0	21.9	99.0%	0.050	0.219		
SO2	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
NOx	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
VOC	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
CO	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		

Emission Unit **EU#13 Debaler**

Pollutant	Maximum Rate (tons/hr)	Emission Factor (lbs/tons)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Allowable Emission Rate (lbs/hr)	
PM	5.0	0.10	0.5	2.2	0.0%	0.500	2.190	12.1	Engineering judgment
PM-10	5.0	0.10	0.5	2.2	0.0%	0.500	2.190		
SO2	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
NOx	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
VOC	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
CO	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		

Emission Unit **EU#14 - EU24, EU27 & EU28 CAFCO blend line**

Pollutant	Maximum Rate (tons/hr)	Emission Factor (lbs/tons)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Allowable Emission Rate (lbs/hr)	
PM	81.6	5.70	465.1	2037.2	99.0%	4.651	20.372	49.3	Measured at CE#9
PM-10	81.6	5.70	465.1	2037.2	99.0%	4.651	20.372		
SO2	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
NOx	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
VOC	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
CO	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		

Emission Unit **EU#25 & EU#26** (0.2 each) **Portable Hoppers #1 & #2**

Pollutant	Maximum Rate (tons/hr)	Emission Factor (lbs/tons)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Allowable Emission Rate (lbs/hr)	
PM	0.4	0.10	0.04	0.2	0.0%	0.040	0.175	2.2	Engineering Judgment
PM-10	0.4	0.10	0.04	0.2	0.0%	0.040	0.175		
SO2	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
NOx	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
VOC	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
CO	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		

Emission Unit **EU#29 &EU30 Fugitive I Receiving Yard & Batching Station**

Pollutant	Maximum Rate (tons/hr)	Emission Factor (lbs/tons)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	
PM	90.0	0.57	51.30	224.7	0.0%	51.300	224.694	Engineering Judgment
PM-10	90.0	0.57	51.30	224.7	0.0%	51.300	224.694	
SO2	0.0	0.00	0.00	0.00	0.0%	0.000	0.00	
NOx	0.0	0.00	0.00	0.00	0.0%	0.000	0.00	
VOC	0.0	0.00	0.00	0.00	0.0%	0.000	0.00	
CO	0.0	0.00	0.00	0.00	0.0%	0.000	0.00	

Emission Unit **EU#31 Ribbon Blender**

Pollutant	Maximum Rate (tons/hr)	Emission Factor (lbs/tons)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Allowable Emission Rate (lbs/hr)	
PM	2.0	1.00	2.00	8.8	99.0%	0.020	0.088	6.5	Engineering Judgment
PM-10	2.0	1.00	2.00	8.8	99.0%	0.020	0.088		
SO2	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
NOx	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
VOC	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		
CO	0.0	0.00	0.00	0.00	0.0%	0.000	0.00		

Emission Unit **EU#34, 35, 38, 39 Storage tanks and perlite hopper** **Negligible emissions**

Summary

EU #	Before Controls	After Controls	Before Controls	After Controls	Before & After Controls	Before & After Controls	Before & After Controls	Before & After Controls	Before & After Controls	Year Installed
	PM	PM	PM-10	PM-10	SO2	NOx	VOC	CO	CS	P = Permitted U = Unpermitted
1	350.4	3.504	350.40	3.50	252.29	50.46	0.00	7884	94.61	<1960 P
2	350.4	3.504	350.40	3.50	252.29	50.46	0.00	7884	94.61	<1960 P
3	315.36	31.536	315.36	31.536	2.74	0.00	509.83	0.00	0.00	<1978 P
4	315.36	31.536	315.36	31.536	2.74	0.00	509.83	0.00	0.00	<1978 P
5	2.628	2.628	2.63	2.628	0.00	0.00	0.00	0.00	0.00	<1980 U
6	2.628	2.628	2.63	2.628	0.00	0.00	0.00	0.00	0.00	<1980 U
7	21.9	0.219	21.90	0.219	0.00	0.00	0.00	0.00	0.00	1987 U
8	4.38	0.0438	4.38	0.0438	0.00	0.00	0.00	0.00	0.00	<1980 U
9	63.8604	0.638604	63.86	0.64	0.00	0.00	0.00	0.00	0.00	<1980 U
10	638.60	6.39	638.60	6.39	0.00	0.00	0.00	0.00	0.00	1991 U
11	31.9302	0.319302	31.93	0.319302	0.00	0.00	0.00	0.00	0.00	1990 U
12	21.9	0.219	21.90	0.219	0.00	0.00	0.00	0.00	0.00	1993 U
13	2.19	2.19	2.19	2.19	0.00	0.00	0.00	0.00	0.00	1980 U
14-24,27,28	2037.2256	20.372256	2037.23	20.37	0.00	0.00	0.00	0.00	0.00	1980 P
25-26	0.1752	0.1752	0.18	0.1752	0.00	0.00	0.00	0.00	0.00	1980 P
29-30	224.694	224.694	224.69	224.69	0.00	0.00	0.00	0.00	0.00	<1980 U
31	8.76	0.0876	8.76	0.0876	0.00	0.00	0.00	0.00	0.00	1988 U
34,35,38,39	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1980, 1997, 1991 U
ALL	4392.40	330.68	4392.40	330.68	510.06	100.92	1019.664	15768	189.216	